Case 5:14-cv-05189-BLF Document 40 Filed 06/25/15 Page 1 of 3

1 2 3 4 5 6 7 8 9	Jennifer S. Romano (CSB No. 195953) jromano@crowell.com CROWELL & MORING LLP 515 South Flower St., 40 th Floor Los Angeles, CA 90071 Telephone: (213) 622-4750 Facsimile: (213) 622-2690 Joel D. Smith (CSB No. 244902) jsmith@crowell.com Rebecca M. Suarez (CSB No. 284853) rsuarez@crowell.com CROWELL & MORING LLP 275 Battery Street, 23rd Floor San Francisco, CA 94111 Telephone: 415.986.2800 Facsimile: 415.986.2827	
11 12	Attorneys for FLOWERS BAKERIES, LLC	
13	UNITED STAT	ES DISTRICT COURT
14	NORTHERN DISTRICT OF O	CALIFORNIA, SAN JOSE DIVISION
15	VELLY DOMEDO, on behalf of bound of and	Case No. 5:14-cv-05189
16	KELLY ROMERO, on behalf of herself and others similarly situated,	
17	Plaintiff,	CLASS ACTION STIPULATION AND [PROPOSED]
18	v.	ORDER CONTINUING JULY 9, 2015 CASE MANAGEMENT STATEMENT
19 20	FLOWERS BAKERIES, LLC dba NATURE'S OWN, a Georgia limited liability company, and DOES 1 through 50,	AND JULY 16, 2015 CASE MANAGEMENT CONFERENCE
20	inclusive,	
22	Defendant.	
23		
24		
25		
26		
27		
28		
CROWELL & MORING LLP	STIDIII ATION TO CONTINU	Case No. 5:14-cv-05189 E CASE MANAGEMENT STATEMENT
ATTORNEYS AT LAW		E CASE IVIANAUEIVIENT STATEIVIENT

Case 5:14-cv-05189-BLF Document 40 Filed 06/25/15 Page 2 of 3

1	Pursuant to Northern District of California Local Rule 6-2, Plaintiff Kelly Romero and
2	Defendant Flowers Bakeries, LLC ("Flowers"), by and through their respective attorneys, hereby
3	stipulate as follows:
4	WHEREAS, on May 6, 2015, the Court granted in part and denied in part Flowers'
5	motion to dismiss the original complaint in this action. (Doc. No. 35.)
6	WHEREAS, pursuant to a stipulation between the parties and this Court's June 3, 2015
7	Order approving the stipulation, the deadline to file Plaintiff's First Amended Complaint ("FAC")
8	is July 6, 2015. (Doc. No. 38.)
9	WHEREAS, the parties' joint Case Management Statement is due July 9, 2015 and the
10	Initial Case Management Conference is scheduled for July 16, 2015. (Doc. No. 36.)
11	WHEREAS, Flowers anticipates that it will likely respond to the FAC by filing another
12	motion to dismiss or stay the action (subject to an analysis of the allegations in the FAC after it is
13	filed). In addition, counsel for Flowers has a scheduling conflict with the currently scheduled
14	July 16, 2015 Case Management Conference.
15	THEREFORE, Flowers and Ms. Romero stipulate and respectfully request that the Court
16	continue the Case Management Statement to Thursday, August 20, 2015, and the Case
17	Management Conference to Thursday, August 27, 2015, or as soon thereafter as the Court may
18	designate.
19	Dated: June 24, 2015 CROWELL & MORING, LLP
20	By:/s/ Joel D. Smith
21	Joel D. Smith
22	Attorneys for Defendant Flowers Bakeries, LLC
23	
24	Dated: June 24, 2015 COUNSELONE, P.C.
25	By:/s/ Anthony Orshansky
26	Anthony Orshansky Attorneys for Plaintiff
27	Kelly Romero
28	1 Case No. 5:14-cv-05189
D	

CROWELL & MORING LLP ATTORNEYS AT LAW

1	[PROPOSED ORDER]
2	PURSUANT TO STIPULATION, IT IS SO ORDERED,
3	Marke Both heart
4	Date: June 25, 2015 Hon. Beth Labson Freeman
5	United States District Judge
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	I, Joel D. Smith, am the ECF User whose ID and password are being used to file this
25	document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the
26	filing of the document has been obtained from each of the other signatories.
27	By: <u>/s/ Joel D. Smith</u> Joel D. Smith
28	Case No. 5:14-cv-05189
CROWELL & MORING LLP ATTORNEYS AT LAW	STIPULATION TO CONTINUE CASE MANAGEMENT STATEMENT AND CASE MANAGEMENT CONFERENCE